IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF IOWA

IN RE:) Chapter II
Mercy Hospital, Iowa City, Iowa, et al	Bankruptcy Case No.: 23-00623
Debtors)))
Dan R. Childers, in his sole capacity as Liquidation Trustee,)) Adversary Case No.: 25-09123
Plaintiff) TRUSTAFF TRAVEL NURSES,
) LLC'S MOTION FOR
VS.) EXTENSION OF TIME
) TO RESPOND TO
Medifis, Inc., et al,) AMENDED COMPLAINT
Defendants	,)

Defendant Trustaff Travel Nurses, LLC ("Trustaff Travel"), by and through undersigned counsel Gordon Rees Scully Mansukhani, LLP, and pursuant to Fed. R. Bankr. P. 9006(b)(1)(A), hereby moves the Court for an order granting an extension of time in which to file a response to the Amended Complaint to Avoid Preference ("Amended Complaint") [Doc. 114] filed by Dan R. Childers, in his sole capacity as Liquidation Trustee ("Plaintiff"). In support of this Motion, Trustaff Travel states as follows:

- 1. On August 7, 2025, Plaintiff filed his Complaint to Avoid Preference [Doc. 1].
- 2. Plaintiff filed his Amended Complaint on November 21, 2025.
- 3. A copy of the Amended Complaint was sent to Trustaff Travel by US Mail dated December 3, 2025, pursuant to the Certification of Service filed on December 4, 2025 [Doc. 136].
 - 4. Undersigned counsel was recently retained in this matter on behalf of Trustaff

Travel, and the retention was over the course of the Christmas and New Years holiday break. Inasmuch, we are requesting additional time to fully evaluate the claims and available defenses in this matter.

5. Undersigned counsel conferred with Abbe Stensland, counsel to the Plaintiff, who consents to an extension of time for Trustaff Travel to respond to the Amended Complaint through and until February 6, 2026.

WHEREFORE, Trustaff Travel respectfully requests the Court grant an extension of time through February 6, 2026, within which to respond to the Amended Complaint.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

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Attorneys for Defendant Trustaff Travel Nurses, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this January 7, 2026, a true and correct copy of the foregoing was served upon all parties registered to receive notice via PACER CM/ECF, and by e-mail to the following:

Abbe Stensland Shuttleworth & Ingersoll, PLC 235 6th Street SE Cedar Rapids, IA 52401 ams@shuttleworthlaw.com

Counsel for Plaintiff

/s/ Thomas J. Joensen
GORDON REES SCULLY MANSUKHANI, LLP